

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WELLS FARGO BANK, NATIONAL)
ASSOCIATION, AS SUCCESSOR BY MERGER)
TO WELLS FARGO BANK MINNESOTA,) Case No: 1:13-CV-6593
NATIONAL ASSOCIATION, AS TRUSTEE FOR)
MERRILL LYNCH MORTGAGE INVESTORS)
TRUST, MORTGAGE LOAN ASSET-BACKED)
CERTIFICATES, SERIES 2003-HE1)
)
Plaintiff,)
V.) Judge: James Holderman
)
JONATHAN C. RENKAS, et al,)
)
Defendants.)

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES the Plaintiff, WELLS FARGO BANK, NATIONAL ASSOCIATION, AS SUCCESSOR BY MERGER TO WELLS FARGO BANK MINNESOTA, NATIONAL ASSOCIATION, AS TRUSTEE FOR MERRILL LYNCH MORTGAGE INVESTORS TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2003-HE1, by and through its attorney, Megan Christine Adams, and moves this Honorable Court for Entry of Judgment of Foreclosure. In support thereof, Plaintiff states as follows:

1. Attached please find Plaintiff's Affidavit of Prove-up attached hereto as Exhibit 1.
2. Attached please find Plaintiff's Certificate of Prove-up of Foreclosure Fees and Costs attached hereto as Exhibit 2.

WHEREFORE, Plaintiff respectfully requests that its Motion for Entry of Judgment of Foreclosure be Granted, that this Court enter a judgment of foreclosure in favor of Plaintiff, enter an award of \$276,818.88 as of September 25, 2013, with interest accruing on the unpaid principal balance at \$45.85 per day, plus attorney's fees and foreclosure costs of \$1,447.50, incurred by the Plaintiff as a result of the foreclosure, and all other relief just and proper.

Respectfully submitted,

/s/ Megan Christine Adams

Megan Christine Adams ARDC#6312221
Potestivo & Associates, P.C.
223 West Jackson Blvd, suite 610
Chicago, IL 60601
(312)263-0003